

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE SUBARU BATTERY DRAIN  
PROD.LIAB. LITIG.

No. 1:20-cv-03095-JHR-MJS

**NOTICE OF MOTION  
FOR PRELIMINARY APPROVAL OF  
PROPOSED CLASS ACTION SETTLEMENT,  
CONDITIONAL CERTIFICATION OF  
SETTLEMENT CLASS, AND  
TO DIRECT CLASS NOTICE**

**COUNSEL:**

**PLEASE TAKE NOTICE** that on a date to be set by the Court, Plaintiffs, by and through their counsel, Mazie Slater Katz & Freeman, LLC and Sauder Schelkopf, LLC and Girard Sharp LLP, will move before the Honorable Joseph H. Rodriguez, U.S.D.J., of the United States District Court for the District of New Jersey, at the Mitchell H. Cohen Building & U.S. Courthouse, located at 4th & Cooper Streets, Camden, New Jersey 08101, for the entry of an Order granting preliminary approval of proposed class action settlement, conditional certification of settlement class, and to direct class notice.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Plaintiff shall rely upon the accompanying brief, Declaration of Matthew R. Mendelsohn and the attached proposed form of Order.

Dated: April 29, 2022

By: /s/ Matthew R. Mendelsohn  
Matthew R. Mendelsohn  
**MAZIE SLATER KATZ & FREEMAN, LLC**  
103 Eisenhower Parkway  
Roseland, NJ 07068  
Telephone: (973) 228-9898  
[mrm@mazieslater.com](mailto:mrm@mazieslater.com)

Matthew D. Schelkopf  
**SAUDER SCHELKOPF LLC**  
1109 Lancaster Avenue  
Berwyn, Pennsylvania 19312  
Telephone: (610) 200-0581  
[mds@sstriallawyers.com](mailto:mds@sstriallawyers.com)

Adam Polk  
**GIRARD SHARP LLP**  
601 California Street, Suite 1400  
San Francisco, CA 94108  
Telephone: (866) 981-4800  
[apolk@girardsharp.com](mailto:apolk@girardsharp.com)

*Plaintiffs' Interim Co-Lead Counsel*